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F EM-453.1 (A. Rampertaap, 3-8191)

T Comments for Final Phase I Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Work Plan, Operable Unit 7, December 1992

D R. Schassburger, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats/Albuquerque Production Division (EM-453), has reviewed the "Draft Addendum to Final Phase I Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation (RFI/RI) Work Plan, Operable Unit (OU) 7," December 1992, document and has prepared the attached comments for your consideration in preparing the final document. Please address these comments during the document finalization process. The draft form of these comments were faxed to you on March 3, 1993.

Our main concerns with the document are as follows:

1. The rationale for conducting the sampling described in this memorandum should be reviewed. Two objectives are provided, (1) to characterize the surface soils at the landfill, and (2) to characterize the asbestos disposal areas. This information is supposedly required for the Human Health Risk Assessment (HHRA); however, it is not clear why this information is required for the HHRA. If the landfill is currently operating in accordance with 40 Code of Federal Regulations (CFR) 265, 40 CFR 257, 40 CFR 61, and 40 CFR 763, and is closed in accordance with these requirements, assessing the human health risk of surface soils is unnecessary because the surface will be modified, (i.e., capped closure requirements for interim status landfills are specified in 40 CFR 265.310). Identification of the applicable requirements at the planning stages of an investigation is part of the Data Quality Objectives (DQOs) process. The planned capping allows the surface soil portion of the investigation to be eliminated. The relationship between the final remedy or landfill closure action that is required is a vital component effort. Only required information should be collected. The HHRA function is to be a component of the final decision process when it is known that the applicable requirements require specific actions. The HHRA process should be modified to supplement those requirements.
2. Sampling the surface soil in the method described in this memorandum would possibly be appropriate if the surface soil were potentially contaminated. The information provided in this memorandum and the OU 7 RFI/RI Work Plan clearly indicates that the surface soil material is cover material brought in from off the plant site. Because this is an active landfill, the surface soils of the landfill are constantly being changed. (A point discussed in this memorandum for not utilizing historical data, Section 2.1.2, p. 2, sixth paragraph). From the information provided, the concern would appear to be with the soil

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cover transported in from off-site. If this is the case then it would seem more appropriate to sample the soil pile before it is used as cover rather than after. The memorandum does not provide evidence or even question whether the cover material would be contaminated. If the cover material is in fact contaminated, then a new source of cover material should be located.

3. The sampling pattern provided appears inappropriate for determining the asbestos disposal trenches. The issue would seem to be whether the trenches had been breached and the potential exists for asbestos to be transported. If this is the case, the biased sampling where the disposal trenches are located would seem to be the best method to determine if a problem exists. To conduct this sampling the location of the disposal areas would need to be known. It is unclear from the memorandum how accurately these locations are known. The use of aerial photographs and geophysics methods may be useful in determining the locations of the trenches.

Please contact me at (301) 903-8191, if you have any questions regarding these comments.



Autar Rampertaap
Chief
Rocky Flats Branch
Rocky Flats/Albuquerque Production Division
Office of Southwestern Area Programs

Attachment

cc w/o attachment:
R. Greenberg, EM-453
J. Hartman, RF

**EM-453.1 COMMENTS ON
DRAFT ADDENDUM TO FINAL PHASE I RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY INVESTIGATION/REMEDIAL INVESTIGATION WORK PLAN
OPERABLE UNIT 7, DECEMBER 1992**

GENERAL COMMENTS

1. Given the nature of this site — a landfill that received Resource Conservation and Recovery Act (RCRA) wastes and is currently active — it would seem that closure would follow RCRA requirements specified in 40 Code of Federal Regulations (CFR) 265.310. For this site installation a landfill cap that meets RCRA requirements would appear necessary. Given this requirement, any surface soil sampling for Human Health Risk Assessment purposes in the landfill itself would be futile.
2. The use of residential lot size as a method for determining grid spacing may be questioned at an interim status RCRA landfill. RCRA closure requirements [and Toxic Substances Control Act regulations on buried asbestos] are explicit with regard to employing institutional controls to control access (40 CFR 763 Subpart E, Appendix D) and restricting future land use [40 CFR 265.117 (c) and 40 CFR 61.153]. The RCRA closure and post-closure requirements should be taken into consideration when developing the Human Health Risk Scenarios.

SPECIFIC COMMENTS:

1. Section 1.0, page (p.) 1, first paragraph: Please clarify the requirement for this sampling effort. There appears to be rationale to characterize the surface soil cover and to confirm/locate the asbestos disposal trenches; however, this is not clear.
2. Section 2.1.2, p. 2, fifth and sixth paragraphs: These two paragraphs appear to suggest that the potential problem is the material that is being used as an interim soil cover. As it is pointed out in paragraph six there is no reason to sample the current soil surface because it is going to be buried with the interim soil cover material. If the concern is that the interim material is contaminated, it would seem to make more sense to sample the material when it is still in a pile than after it is spread across the site. Please clarify the rationale for this sampling, what is being sampled, and why.
3. Section 2.1.2, p. 3, second paragraph: Please provide specifics regarding the information on the asbestos trenches, i.e., was this in written records, aerial photographs, recollections by past employees. All relevant information on these trenches should be included or expanded.

4. Section 3.1.1, p. 7, second paragraph: The statement that the spatial trends are not expected is untrue. If the asbestos was disposed in trenches, then it is likely the asbestos is concentrated in the areas of the trenches.
5. Section 3.1.3, p. 8, fifth paragraph: The rationale for full site analysis has not been presented. Please describe the need for full site analysis.
6. Section 3.1.2, p. 8, third paragraph: This discussion should include how background on asbestos should be determined. Naturally occurring asbestos is possible. This possibility should have been taken into consideration when background conditions were characterized. Please clarify.
7. Section 3.2, p. 9: Please clarify how the techniques will be chosen and how these methods will be documented.